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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JOHN W.
MCCAULEY IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF LETTER
BRIEF REGARDING WAYMO'S
MOTION TO COMPEL**

I, John W. McCauley, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal Portions of its June 21, 2017 Letter Brief Regarding Waymo’s Motion to Compel (the “Letter Brief”) and Exhibits thereto (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Portions of Waymo’s Letter Brief	Portions highlighted in blue	Defendants
	Portions highlighted in green	Waymo
Exhibit 1 of Waymo’s Letter Brief	Entire Document	Defendants
Exhibit 2 of Waymo’s Letter Brief	Portions highlighted in blue	Defendants
Exhibit 3 of Waymo’s Letter Brief	Portions highlighted in yellow and blue	Defendants
Exhibit 5 of Waymo’s Letter Brief	Entire Document	Defendants
Exhibit 6 of Waymo’s Letter Brief	Entire Document	Defendants
Exhibit 7 of Waymo’s Letter Brief	Entire Document	Defendants
Exhibit 8 of Waymo’s Letter Brief	Entire Document	Defendants
Exhibit 9 of Waymo’s Letter Brief	Entire Document	Defendants
Exhibit 13 of Waymo’s Letter Brief	Entire Document	Defendants
Exhibit 16 of Waymo’s Letter Brief	Entire Document	Defendants

3. Waymo has filed portions of its Letter Brief (portions highlighted in blue) and the Exhibits to the Letter Brief under seal because they contain information that Defendants have designated confidential.

4. Waymo expects Defendants to file one or more declarations in accordance with the Local Rules.

5. The Letter Brief also contains or refers to trade secret and confidential business information, which Waymo seeks to seal.

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from John W. McCauley.

/s/ Charles K. Verhoeven
Charles K. Verhoeven